

**Statement of Basis
Boise Cascade Wood Products, LLC
Chapman, Butler County, Alabama
Facility/Permit No. 203-S001**

This draft Title V Major Source Operating Permit (MSOP) renewal is issued under the provisions of ADEM Admin. Code r. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

The facility was originally constructed/began operations in 1972. The initial application for this renewal was received July 2, 2024. Addenda to the application were received on September 20, 2024, December 19, 2024, and March 21, 2025, when the application was deemed complete. The initial MSOP was issued on December 28, 1999, and this is the 5th renewal. The current MSOP was issued on March 2, 2020, became effective on March 2, 2020, and expired on December 27, 2024.

The following modifications have been made to the current MSOP since its issuance:

May 25, 2021: 502 (B) 10, flexibility modification for reconfiguration of the Plywood Mill Operations' three baghouses (EU 017, 021 and 022).

September 23, 2024: An application was received from Boise Cascade for change of ownership of the facility from Coastal Forest Products. The ownership change would be reflected in this renewal.

The facility is located in Butler County, which is currently listed as attainment/unclassifiable with all National Ambient Air Quality Standards (NAAQS). There are no current or ongoing enforcement actions against Boise Cascade necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at <https://echo.epa.gov> (Search using Facility ID AL0000000010130S001).

Permit History

Issuance No./ Permit No.	Issuance Date	Limit(s) Established	Limit(s) Basis/ Reasoning
Air Permit No. X027	January 13, 2014	20 Section Veneer Dryer: PM 0.90 lb/hr PM ₁₀ 2.63 lb/hr PM _{2.5} 1.99 lb/hr VOC 6.9 lb/hr	Synthetic Minor Limits (PSD)

Air Permit No. X027	January 13, 2014	16 Section Veneer Dryer: PM 0.72 lb/hr PM ₁₀ 2.1 lb/hr PM _{2.5} 1.59 lb/hr VOC 5.52 lb/hr	Synthetic Minor Limits (PSD)
Air Permit No. X027	January 13, 2014	12 Section Veneer Dryer: PM 0.54 lb/hr PM ₁₀ 1.58 lb/hr PM _{2.5} 1.2 lb/hr VOC 4.14 lb/hr	Synthetic Minor Limits (PSD)
Air Permit No. X028	January 13, 2014	Plywood Presses: Production limited to 280,000 MSF/yr	Synthetic Minor Limit (PSD)
Air Permit No. X032	January 13, 2014	682 Hp Emergency Generator: Limited to operate \leq 500 hr/yr	Synthetic Minor Limit (PSD)
Air Permit No. X034	January 12, 2015	Fuel House Cyclone (016A): PM 9.5 lb/hr	Synthetic Minor Limit (PSD)

Facility Operations

Boise Cascade (BC) produces southern pine plywood. The facility indicated in the application that the sawmill adjacent to the plywood mill has permanently closed. The significant sources of air pollutants at this facility are a 121.2 MMBtu/hr wood-fired boiler, a 63.1 MMBtu/hr wood-fired boiler, a fuel house with cyclone, three veneer dryers controlled by an RCO, two plywood presses, plywood mill operations with three baghouses, miscellaneous coating operations, a 15,000 gallon resin storage tank, a 230 hp diesel fire water pump, and a 682 hp diesel-fired emergency generator.

Proposed Changes

BC proposes to remove all components of the lumber manufacturing process in the current Title V MSOP which consists of three steam-heated lumber dry kilns, a planer mill, and a sawmill chipper. The sawmill ceased operations on January 10, 2024. The facility also requests to utilize two small (< 25 Hp) propane fired generators to provide electricity during emergencies.

Applicability: Federal Regulations

Title V

Based on the Title V permit application, this facility is a major source as the potential emissions of particulate matter (PM), volatile organic compounds (VOC), oxides of nitrogen NO_x, and carbon monoxide (CO), each exceed the 100 TPY major source threshold. The emissions of methanol, hydrogen chloride, and combined total HAP also exceed the 10/25 TPY major source thresholds for HAP emissions. The facility's potential emissions of CO_{2e} are 175,777 TPY.

PSD

This facility is located in an attainment area for all criteria pollutants, and its operations are not one of the 28 listed major source categories. It is considered a major source for PSD regulations as its facility-wide potential emissions of PM, CO, and VOC are greater than 250 TPY. As outlined in the Permitting History section above, several processes at the facility have synthetic minor emission and production limits that were taken to avoid triggering PSD review.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

PCWP MACT

As a major source of HAP, all the processes associated with the plywood manufacturing at this facility (except the boilers) are considered affected sources under the National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD [adopted by reference at ADEM Admin. Code r. 335-3-11-.06(81)], the “PCWP MACT”. The facility was required to be in compliance with the applicable standards by October 1, 2008. The only PCWP processes subject to any compliance or work practice standards are the veneer dryers and miscellaneous coating operations.

Veneer Dryers

The emissions from the hot section of the veneer dryers are routed to a Regenerative Catalytic Oxidizer (RCO). On October 3, 2024, the facility conducted Method 25A testing on the unit which demonstrated the RCO had an average destruction and removal efficiency (DRE) of 94.8%, which is greater than the minimum DRE (90%) required by Subpart DDDD. The performance test established a minimum 3-hour operating temperature for the RCO at or above 1,046 °F which the facility is required to monitor. In correspondence received on November 15, 2024, Boise Cascade indicated the RCO combustion temperature would be maintained at 1,075 °F to ensure the temperature is maintained above the minimum requirement. The facility is required to demonstrate continuous compliance with Subpart DDDD for the veneer dryers in accordance with the following:

- Minimize fugitive emissions,
- Check the activity level of the RCO catalyst in accordance with Tables 2 and 7 to Subpart DDDD,
- Conduct compliance testing every five years,
- Maintain all the applicable records specified in 40 CFR §63.2282 and Tables 7 and 8 to Subpart DDDD,
- Submit all the applicable reports specified in 40 CFR §63.2281 and Table 9 to Subpart DDDD,
- Report each instance in which the selected compliance option or operating requirement was not met as specified in 40 CFR §63.2271(b),
- Report any deviation in accordance with 40 CFR §63.2281,

- Comply with the applicable notification requirements in 40 CFR §63.2280, reporting requirements in 40 CFR §63.2281 and Table 9 to Subpart DDDD, and the recordkeeping requirements in 40 CFR §63.2282 and §63.2283.

Miscellaneous Coating Operations

The moldicide station, plyform oil station, logo painting station, plywood patch station, and grade stamping are affected sources under Subpart DDDD as they are classified as miscellaneous coating operations. Subpart DDDD requires that Group 1 miscellaneous coating operations utilize non-HAP coatings as defined in §63.2292 (*a coating with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR §1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds*) and keep records showing that the facility is using non-HAP coatings. Provisions would be included in the MSOP for the logo painting station, plyform oil station, and grade stamping that would include these requirements. The remaining processes are not subject to the Group 1 miscellaneous coating operation requirements. The facility submitted a Notification of Compliance Status for the Miscellaneous Coating Operation processes on November 21, 2007.

RICE MACT

This facility utilizes a 682 Hp diesel-fired emergency generator, a 230 Hp diesel-fired fire water pump engine, and two (23.6 Hp and 21.5 Hp) propane-fired emergency generators. The facility is therefore subject to 40 CFR 63, Subpart ZZZZ, the *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (the “RICE MACT”) as a major source of HAP. The engines are affected sources under Subpart ZZZZ.

682 Hp Diesel-Fired Emergency Generator

In accordance with 40 CFR §63.6590(b)(3)(iii) an existing emergency stationary RICE with a rating greater than 500 Hp at a major source of HAP emissions has no applicable requirements under Subpart ZZZZ or 40 CFR 63 Subpart A provided the facility complies with the following criteria:

- (a) The permittee shall operate this engine in accordance with the criteria specified in the definition of “emergency stationary RICE” in §63.6675;
- (b) The permittee shall operate this engine only for the purposes and durations described in §63.6640(f)(1) through (3), which include: 1) emergency situations (no time limit under Subpart ZZZZ), 2) maintenance checks and readiness testing, emergency demand response (up to 100 hours per calendar year), and 3) operation in non-emergency situations (up to 50 hours per calendar year which shall be counted towards the 100 hours per calendar year allowed for maintenance, and testing and emergency demand response provided in §63.6640(f)(2)); and
- (c) The permittee shall not operate or shall not contractually obligate the engine to be available for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii) and (iii).
- (d) If the permittee does not operate this engine according to the requirements in paragraphs §63.6640(f)(1) through (3) of this section, the engine will not be

considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

Should this unit exceed any operational limitation, at any time, Boise Cascade must notify the Air Division within two working days of determining that the exceedance occurred. The facility must calculate and record this unit's hours of operation within ten days of the last day of each month. For a period of 5 years following the date of documentation, records of the unit's hours of operation must be maintained in a form suitable for inspection and made readily available for review.

230 Hp Diesel-Fired Fire Water Pump Engine

The 230 Hp Fire Water Pump Engine is subject to the applicable requirements of Subpart ZZZZ, and the applicable requirements of 40 CFR 63, Subpart A, General Provisions as provided in Table 8 to Subpart ZZZZ. The facility must comply with the applicable requirements of 40 CFR §63.6602 and Table 2c to Subpart ZZZZ, which include, but may not be limited to:

- (a) Meet the following work practice requirements, except during periods of startup:
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- (b) During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.
- (c) If a unit is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.
- (d) The Permittee shall not operate this unit except as provided in §63.6640(f)(1) through (f)(4), which include but may not be limited to:
 - i. Emergency situations;

- ii. Maintenance checks and readiness testing, not to exceed 100 hours per year; and
- iii. Non-emergency situations, not to exceed 50 hours per year (those 50 hours are counted towards the 100 hours per year provided for maintenance and testing).

In accordance with 40 CFR §63.6625(e) & 40 CFR §63.6640(a), the facility must operate and maintain the unit according to the manufacturer's emission-related written instructions or develop a maintenance plan that provides for, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The engine must be equipped with an hour meter in accordance with 40 CFR §63.6625(f).

In accordance with 40 CFR §63.6655, Boise Cascade must keep records of the operation and maintenance of the unit. At a minimum, these records shall include:

- (a) For each period of operation, the length of operation and the reason the engine was in operation during that time. For periods of operation designated as “emergency operation,” the records shall reflect what classified the operation as emergency;
- (b) The total number of hours the engine was operated during a calendar year subtotaled by the reason the engine was in operation;
- (c) The dates of each oil and filter change with the corresponding hour on the hour meter;
- (d) The dates of each inspection and replacement of air cleaners, hoses, and belts with the corresponding hour on the hour meter; and
- (e) The dates and nature of other emission-related repairs and maintenance performed.

The facility must maintain onsite for the life of the unit either a copy of the manufacturer’s emission-related operation and maintenance instructions for the unit or the maintenance plan developed in accordance with §63.6625(e). In accordance with 40 CFR §63.6660, and 40 CFR §63.10(b)(1), Boise Cascade must maintain files of all information (including all reports and notifications) required by 40 CFR 63, Subparts A and ZZZZ for the unit, recorded in a form suitable and readily available for expeditious inspection and review. The files must be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data must be retained onsite. The remaining 3 years of data may be retained offsite.

In accordance with 40 CFR §63.6640(b), the facility must report to the Air Division any failure to perform a work practice on the schedule required, including instances when the

work practice standard was not performed due to emergency operation or unacceptable risk under a federal, state, or local law. The facility must submit the report within two working days of the deviation and provide an explanation as to why the work practice requirement was not performed.

23.6 Hp and 21.5 Hp Propane-Fired Emergency Generators

The propane-fired emergency generators are subject to 40 CFR Part 63, Subpart ZZZZ. §63.6590(c)(6) states that these engines would meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart JJJJ (*Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*).

Boiler MACT

The boilers at this facility are subject to 40 CFR 63 Subpart DDDDD, the *National Emission Standards for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters*. The facility submitted an Initial Notification as required by Subpart DDDDD on February 2, 2012. The boilers are considered existing sources as they were constructed prior to June 4, 2010. Each boiler is equipped with a wet scrubber and an O₂ trim system.

The boilers are classified as existing hybrid suspension/grate burners designed to burn wet biomass/bio-based solid. BC has elected to demonstrate continuous compliance through initial and ongoing performance stack testing, performing 5-year tune-ups, conducting required monitoring, and the submittal of required notifications and reports as specified under the Boiler MACT.

The wood-fired boilers are subject to emission limitations for CO and PM as listed in Table 2. The CO emissions must not exceed 3500 ppm by volume on a dry basis corrected to 3 percent oxygen. The PM emissions must not exceed 0.44 lb per MMBtu of heat input. As units designed to burn solid fuel, the boilers are subject to an emissions limitation for hydrochloric acid (HCl) and mercury (Hg). The HCl emissions must not exceed 0.022 pounds per MMBtu of heat input (until October 6, 2025), and 0.020 pounds per MMBtu of heat input (after October 6, 2025). The Hg emissions must not exceed 0.0000057 pounds per MMBtu of heat input (Until October 6, 2025), and 0.0000054 pounds per MMBtu of heat input (after October 6, 2025). BC has elected to demonstrate compliance with these limitations through stack testing, using the methods listed in Table 2 of Subpart DDDDD, or through fuel analysis in accordance with Table 6 of Subpart DDDDD.

The wood-fired boilers are subject to the work practice standards listed in Table 3 of the subpart. BC must conduct a tune-up of the boilers every five years as specified in 40 CFR §63.7540. Each tune-up must be conducted no more than 61 months after the previous tune-up according to 40 CFR §63.7515(d). Additionally, BC must conduct a one-time energy assessment performed by a qualified energy assessor. These assessments were performed on January 11-12, 2016, in accordance with 40 CFR §63.7510(e) and Table 3 of Subpart DDDDD.

The wood-fired boilers are subject to the operating limitations listed in Table 4 of Subpart DDDDD. For the PM scrubber control, BC must maintain the 30-day rolling average pressure drop and the 30-day rolling average liquid flow rate at or above the lowest one-hour average pressure drop and the lowest one-hour average liquid flow rate, respectively, measured during

the performance test demonstrating compliance with the PM, Hg, and HCl emission limitation according to 40 CFR §63.7530(b) and Table 7 of Subpart DDDDD. The facility must maintain the 30-day rolling average operating load of each unit such that it does not exceed 110 percent of the highest hourly average operating load recorded during the performance test. BC utilizes an oxygen trim system for the wood-fired boilers as specified in 40 CFR §63.7525(a)(7). The facility must operate the oxygen trim system with the oxygen level set at or above the lowest hourly average oxygen concentration measured during the CO performance test.

Performance testing must be completed in accordance with 40 CFR §63.7520 and Table 5 of Subpart DDDDD, on an annual basis. Annual performance tests must be completed no more than 13 months after the previous performance test, except as specified in 40 CFR §63.7515(b) through (e). Performance stack testing will be used to establish site-specific operating limits that apply to BC in accordance with 40 CFR §63.7530(b). The facility must complete and submit the Notification of Compliance Status according to 40 CFR §63.7530 (e) and (f), and 40 CFR §63.7545(e). A Notification of Intent to conduct performance testing must be submitted at least 60 days before the performance test is scheduled to begin.

BC must monitor and collect data according to 40 CFR §63.7535 and the site-specific monitoring plan. 40 CFR §63.7540 and Table 8 of Subpart DDDDD provides detailed monitoring requirements for continuous compliance monitoring. Deviations must be reported according to the requirements in 40 CFR §63.7550. Reporting requirements listed in 40 CFR §63.7550 and Table 9 of Subpart DDDDD requires semiannual reporting for the wood-fired boilers. Each semiannual report must contain the information outlined by 40 CFR §63.7550(c).

New Source Performance Standards (NSPS)

The boilers, 682 Hp emergency generator, and 230 Hp fire water pump engine are not subject to any NSPS as they were installed prior to the respective applicability dates. The 23.6 Hp and 21.5 Hp emergency generators would be exempt from any requirements of Subpart JJJJ based on their size in accordance with §60.4230(4)(iv). The facility would maintain records of the date, time, duration, and purpose of operation each time these units are operated to demonstrate the engines are emergency generators. The resin tank is not subject to NSPS Subpart Kb since its capacity is less than 19,813 gallons.

Applicability: State Regulations

The particulate matter (as TSP) from each boiler is limited to 0.20 gr/dscf, adjusted to 50% excess air, as outlined in ADEM Admin. Code r. 335-3-4-.08(2)(d). The sulfur dioxide emissions from each boiler are limited to 4 lb/MMBtu as outlined in ADEM Admin. Code r. 335-3-5-.01(b).

The veneer dryers, plywood presses, plywood mill operations, and fuel house cyclone are each subject to the particulate matter (as TSP) emission limitations of ADEM Admin. Code r. 335-3-4-.04 for Process Industries-General. The allowable emission rate for each process is calculated using one of the following process weight equations:

$$E = 3.59P^{0.62} \text{ (P < 30 tons per hour) OR}$$

$E = 17.31P^{0.16}$ ($P \geq 30$ tons per hour)
where E = Emissions in pounds per hour
P = Process weight per hour in tons per hour

ADEM Admin. Code r. 335-3-4-.01(1) sets forth a visible emissions standard which states that each stationary source at the facility shall not emit particulate of an opacity greater than twenty percent (20%) more than once during any 60-minute period; as determined by a six-minute average, and at no time shall emit particulate of an opacity greater than 40%, as determined by a six-minute average.

Emission Testing and Monitoring

Boilers

PM

CAM

The boilers are equipped with Ducon Venturi Scrubbers to control particulate emissions. Since the post-controlled particulate emissions from the boilers are greater than the applicable major source thresholds, the boilers would be subject to the requirements of 40 CFR 64, Compliance Assurance Monitoring for large pollutant-specific emission units. As the boilers would be subject to 40 CFR Part 63, Subpart DDDDD, the Boiler MACT, the monitoring requirements for CAM would be satisfied by the MACT monitoring requirements.

If BC determines through emission testing that indicator values other than those specified above are more appropriate, they shall submit a notification of the fact to the Air Division within 30 days of determining that a new indicator value(s) should be established. The notification shall include the data supporting the validity of the newly established indicator value(s).

The scrubbers shall be equipped with audible alarms which sound if the scrubber differential pressure or water flow rate drops below the minimum established parametric rates.

Upon detecting an excursion or exceedance of any operating parameter as indicated by the required monitoring, BC shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

The response to any excursion or exceedance of the required monitoring parameters shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that

operation returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance shall be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

Properly maintained devices shall be utilized to monitor the pressure differential across and water flow to the wet scrubber. The devices shall be calibrated in accordance with the manufacturer's recommendations and necessary parts maintained for routine repair.

Records of excursions and exceedances, the causes of the events, and the corrective action measures taken shall be maintained in a form suitable for inspection for a period of five years from the date of generation.

Periodic Monitoring

The requirements for periodic monitoring for the boilers regarding PM emissions would be satisfied by the monitoring and reporting requirements as discussed in the CAM section of this document. No other periodic monitoring would be required for the boilers.

Testing

During testing conducted on the boilers on March 1 and 2, 2023, the facility demonstrated compliance with the applicable standards for particulate matter (PM), and carbon monoxide (CO). The facility demonstrates compliance with the mercury (Hg), and hydrogen chloride (HCL) standards by performing quarterly fuel analyses in accordance with Table 6 of Subpart DDDDD.

The following parameters were established during testing of the boilers for the purpose of demonstrating continuous compliance in accordance with Subpart DDDDD:

	Boiler No. 1	Boiler No. 3
Max. 30-Day Rolling Average Steam Flow Rate (PPH)	91,105	40,527
Min. O ₂ Trim System Set Point (%)	3.94	5.2
Min. 30-Day Rolling Average Scrubber Flow Rate (gpm)	558.0	494.1
Min. 30-Day Rolling Average Scrubber Differential Pressure (in. H ₂ O)	14.2	12.4

No additional testing would be required at this time. However, the facility would be required to conduct testing for PM and CO in 2026 to demonstrate continuous compliance with the requirements of the Boiler MACT.

Sulfur Dioxide

The boilers are also subject to the SIP SO₂ allowable emission rate of 4.0 lb/MMBtu of heat input. Wood residue is the primary fuel source for these boilers. The facility is allowed under certain conditions to burn used oil generated on site as a result of spills, etc., for the purpose of disposal and energy recovery.

Records indicating the quantity, duration, and date used oil is burned would be required. Due to the minimal expected SO₂ emissions from the combustion of wood residue and from the negligible amount of used oil combusted, no further emission testing or monitoring for SO₂ is considered necessary.

Veneer Dryers

VOC

Periodic Monitoring

The periodic monitoring requirements for these units would be satisfied by the monitoring requirements of the PCWP MACT.

Testing

As noted above, the facility is required to conduct emission testing on these units every five years to demonstrate compliance with the PCWP MACT. No additional testing would be required at this time.

PM/Visible Emissions

Emissions from the dryer vents are primarily condensed water vapor and VOC driven off from the drying veneer. Due to the nature of the emissions from the dryers, emission testing and monitoring for the SIP visible emissions and particulate standards is not considered practical.

Plywood Mill Operations

PM/Visible Emissions

Periodic Monitoring

To demonstrate compliance with the visible emissions standard, emission monitoring would include weekly observations of the baghouses for any visible emissions during daylight hours while the unit is operating.

BC would be required to take corrective action to eliminate emissions as soon as practicable but no longer than 24 hours from the time of observation if emissions

are observed, followed by an additional observation to confirm that emissions have been eliminated. Each baghouse would be inspected for proper operation and cleaned at least annually and whenever visible emissions are observed.

BC would be required to maintain records of the weekly observations, inspections, corrective actions, and emissions-related maintenance performed in a logbook for five years from the date of generation.

Testing

Emission testing for PM would not be required at this time for these processes as they are expected to be able to comply with the applicable emission limits since baghouses are utilized to control emissions.

Fuel House w/Cyclone

PM/Visible Emissions

Periodic Monitoring

For compliance with the visible emission standard, emission monitoring includes weekly observations of the cyclone for greater than normal visible emissions as determined by previous observations.

BC is required to take corrective action to reduce emissions to normal as soon as practicable but no longer than 24 hours from the time of observation if emissions are greater than normal, followed by an additional observation to confirm that emissions have returned to normal. The cyclone must be inspected for proper operation and cleaned at least annually and whenever observed visible emissions are greater than normal.

BC is required to maintain records of the weekly observations, inspections, corrective actions, and emissions-related maintenance performed in a logbook for five years from the date of generation.

Testing

Emission testing for PM would not be required at this time for this process as it is expected to be able to comply with the applicable emission limits since a cyclone is utilized as the material separation device.

Coastal Consistency/Class 1

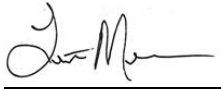
This facility is not located within the 10-foot contour range of Mobile and Baldwin Counties. It is also not located within 100 km of any Class 1 area.

Public Notice

The renewal of this Title V MSOP would require a 30-day public comment period and a 45-day EPA review period.

Recommendation

Based on the above analysis I recommend that Boise Cascade Wood Products' Title V MSOP be renewed with the requirements noted above pending the resolution of any comments received during the 30-day public comment period and the EPA 45-day review.



Lester Meredith
Chemical Branch
Air Division

April 8, 2025
Date

VLM/vlm